

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Mark A Vallejo Maritza Vallejo Case No. 19-24735 Chapter 7

All Cases: Moving Creditor WELLS FARGO BANK, N.A. Date Case Filed 8/30/19

Nature of Relief Sought: X Lift Stay        Annul Stay        Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed \_\_\_\_\_

Chapter 7:        No-Asset Report filed on \_\_\_\_\_  
X No-Asset Report not Filed, Date of Creditor's Meeting: 11/04/2019

1. Collateral  
a. Home X  
b. Car        Year, Make and Model \_\_\_\_\_  
c. Other \_\_\_\_\_

2. Balance Owed as of 09/06/2019: \$455,003.67  
Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$330,000.00, Price Opinion based on comparables.

5. Default  
a. X Total Default as of 09/06/2019  
Number of months 13 Amount \$41,223.48  
b.        Post-Petition Default  
i.        On direct payments to the moving creditor  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_  
ii.        On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \_\_\_\_\_

6. Other Allegations  
a.        Lack of Adequate Protection § 362(d)(1)  
i.        No insurance  
ii.        Taxes unpaid Amount \_\_\_\_\_  
iii.        Rapidly depreciating asset  
iv.        Other (describe) \_\_\_\_\_  
b. X No Equity and not Necessary for an Effective Reorganization § 362(d)(2)  
c.        Other "Cause" § 362(d)(1)  
i.        Bad faith (describe) \_\_\_\_\_  
ii.        Multiple filings \_\_\_\_\_  
iii.        Other (describe) \_\_\_\_\_  
d. Debtor's Statement of Intention regarding the Collateral  
i.        Reaffirm ii.        Redeem  
iii. X Surrender iv.        No Statement of Intention Filed

Date: 9/26/2019

/s/ Joel P. Fonferko

Counsel for Movant